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ABSTRACT

The principles espoused by the Job Training Partnership Act (JTPA) may lead to a severe negative effect on Hispanic American participation rates. Decentralization erodes Federal oversight over targeting and monitoring efforts, thus endangering equal access to training programs by the disadvantaged and minorities. Hispanic, small, and minority business, and community-based organization representation in the Private Industry Councils set up by JTPA may be low due to the lack of strong language mandating such representation. Restrictions on training stipends may have a negative effect on those who most need training but can least afford the extra costs associated with training, such as transportation and child care. The emphasis on performance standards based on positive placements may cause organizations to "cream" (select the apparent best) participants, thus ignoring the disadvantaged and long-term unemployed. Perhaps most important, Hispanic participation is likely to plummet unless Hispanic community-based organizations continue to play a major role in client outreach and in delivery of employment and training services. The ability of the JTPA, in its current form, to equitably serve Hispanics is questionable; thus, the Act must be monitored for its short-term and long-term impact on the Hispanic community, with the end of bringing about changes. (CMG)

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THE JOB TRAINING PARTNERSHIP ACT

AN OVERVIEW FROM THE HISPANIC PERSPECTIVE

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I. THE JOB TRAINING PARTNERSHIP ACT

AN OVERVIEW FROM THE HISPANIC PERSPECTIVE

The Job Training Partnership Act (JTPA) was passed by Congress and signed by the President in October 1982. JTPA replaced the Comprehensive Employment and Training Act (CETA) as the nation's primary federal employment and training legislation on October 1, 1983. JTPA was developed to continue the federal commitment to assist youth and unskilled adults for entry into the labor market and to afford job training to economically disadvantaged individuals who are in need of such training to obtain productive employment. Thus, its purposes are not unlike those of CETA.

However, JTPA introduces significant changes to the employment and training system. One of the major issues to emerge during JTPA's development was the appropriate relationship between the federal, state and local governments. Under JTPA, within the context of President Ronald Reagan's "New Federalism," the state now assumes many of the functions previously performed by the Department of Labor. Governors are thus given significantly increased authority to shape the state employment and training system, including designation of Service Delivery Areas (SDAs), and general oversight of state and local programs, and management of performance.

Concurrently, JTPA expands local decision-making authority to give local areas great flexibility to decide how programs will be administered and managed and what types and mixes of programs will be provided. However, while CETA gave local authority to cities and counties, under JTPA these local decisions are made through the private/public sector partnership which is the foundation of JTPA. Local elected officials will appoint the members of the Private Industry Councils (PICs) the majority of which should represent the private sector.

JTPA significantly departs from CETA in its elimination of public service employment (PSE) slots and near elimination of funds for training stipends. CETA provisions relating to PSE and mandatory allowances have been repealed. JTPA's developers believe that thse changes will lead to an emphasis on training rather than income maintenance.

in line with the legislative wish for an effective return on investment, JTPA emphasizes the concept of performance standards, and stipulates that they focus on increased employment and earnings ard reflect a reduction of welfare. The emphasis on performance is further augmented by incentive funding for successful programs. While the benefits of such accountability are obvious, the inherent danger of performance standards based on positive placements is that it may encourage "creaming"--the tendency to select as clients persons who are least disadvantaged and easiest to place. These individuals are considered a less risky investment than other more disadvantaged individuals. Hispanics and other individuals with serious employment barriers may find themselves excluded from participation in training programs due to the tendency to "cream" on the part of program operators. Furthermore, the lack of targeting language in JTPA contributes to the exclusion of minorities in employment and training programs.

The principles espoused by the Job Training Partnership Act may lead to a severe negative effect on Hispanic participation rates. The concept of decentralization erodes federal oversight over targeting and monitoring efforts, thus endangering equal access to training programs by the disadvantaged and minorities. Hispanic, small and minority business, and CBO representation in the PICs may be low due to the lack of strong language mandating such representation. The restriction on training stipends may have a chilling effect on those individuals who are most in need of training but who can least afford the extra costs associated with training, such as transportation and child care. The emphasis on performance standards based on positive placements may cause organizations to "cream" participants, thus, ignoring the disadvantaged and long-term unemployed. Perhaps most important, Hispanic participation is likely to plummet unless Hispanic community-based organizations (CBOs) continue to play a major role in client outreach and in delivery of employment and training services.

If Hispanics are to be equitably served under JTPA, factors affecting Hispanic participation, whether as clients or as service deliverers, must be identified early. Policy makers and community leaders must become aware of the need to remove obstacles to such participation and encourage full Hispanic involvement in JTPA planning and implementation. The manner in which JTPA was drafted, with its ambiguous and non-targeted language, may lead to a disastruous exclusion of Hispanics and other disadvantaged groups. JTPA's deficiencies also reflect the short-sightedness of policy makers. Hispanics are the fastest-growing constituency and the youngest subpopulation group in America; they will be an increasing proportion of the future labor force. The taxes paid by future Hispanic workers

will be critical to support the Social Security system. Thus, a long-term benefit for the society in general requires a federal employment and training policy which effectively addresses the needs of the Hispanic community, and assures equitable access to training programs. The ability of JTPA, in its current form, to equitably serve Hispanics and other minorities and disadvantaged persons is extremely questionable; thus, JTPA needs to be monitored for its short-term and long-term impact on the Hispanic community. The original CETA legislation had some similar deficiencies, many of which were corrected through legislative amendments and increased federal regulations and oversight. If similar improvements are to be made in JTPA, careful monitoring is an essential first step and the greatest challenge that faces the Hispanic community.

II. JTPA ROLES AND RESPONSIBILITIES

JTPA decentralizes the federal employment and training programs, and represents a further delegation of federal authority to the states. It greatly increases state responsibility for the authority over local operations, imposing states as a layer between Washington and local programs. Whereas under CETA, employment and training programs were the joint responsibility of the federal and local governments, under JTPA these programs are the responsibility of the state and local governments, with the state as primary actor and the federal government assuming a minimal role.

A. State Role

The basic supervisory role previously performed by the federal government is now the responsibility of the state. Under JTPA, the state is the key actor in the approval of the local job training programs. The state has defined the structure of the delivery system through the determination of service delivery areas (SDAs). This critical determination was done by the Governor, after receiving the recommendations of the State Job Training Coordinating Council (SJTCC) and after reviewing the proposals of local government and business officials. Other specific functions of the Governor include:

- Appointing the State Job Training Coordinating Council;
- Certifying the Private Industry Councils from each SDA;
- Setting state-wide goals and objectives and providing basic guidelines for the development of local area plans;
- Approving locally developed plans;
- Allocating funds to local service delivery areas; and
- Monitoring and auditing the performance of plans.

B. Local Role

Local elected officials are working with representatives from the business, education and labor communities in the planning and implementation of job training programs. They appoint the members of the Private Industry Councils (PICs) and will work with them to set local priorities and develop programs conducive to state employment and training goals.

After an area is named a Service Delivery Area by the Governor and the PIC has been appointed by the local elected official (LEO), the LEO must sit down with the PIC and mutually decide who will plan the program, who will

administer the program, who will receive funds, and who will monitor the program. The PIC and LEO must both agree to these initial decisions. At a local level, for example, it may be decided that the PIC will act as a board of directors, with another entity having general oversight of the program and current approval of the plan. The possible divisions of responsibility are wide, but these decisions must be worked out at a local level.

Under JTPA, unlike CETA, the LEO does not receive funds directly from the federal government. Instead, JTPA dictates that the funds go from the federal government to the Governor. The Governor then passes the funds to the Service Delivery Area's recipient of funds (determined by the PIC and LEO).

Thirty-nine States and Territories have completed PIC certification. The total number of certified PICs stands at 565. All jurisdictions have formally designated SDAs and have a designated state agency responsible for the administration of JTPA.

C. Federal Role

The federal government, through the Department of Labor (DOL), provides national policy direction and oversight to JTPA, primarily through the creation of regulations and establishment of performance standards. It also administers national programs such as employment and training for Native Americans, migrant and seasonal farmworkers, veterans, and administers the Job Corps Program.

In line with the concept of decentralization, DOL issued regulations (Federal Register, March 15, 1983) for JTPA which give states maximum authority to interpret most provisions of the law. The effect of DOL's approach is to create a policy and oversight void. Whether the states fill this void in a manner consistent with the intent of the law remains to be seen, and this will play a large role in determining the long-term impact of the Job Training Partnership Act.

III. JTPA FUNDING FEATURES

The Job Training Partnership Act includes the following funding provisions:

- Permanent authorization is provided for JTPA; the program has no "sunset" provisions;
- A funding level is established on a "such sums as necessary" basis, rather than having a ceiling amount;
- Separate funding allocations are made for:

Title IIA, IV	Disadvantaged Adults and Youth/National Programs
Title IIB	Summer Youth Employment Programs
Title III	Dislocated Workers Program

- Funds flow from the Department of Labor to the Governor to the local Service Delivery Area; and
- Funding formulas are established for to state and within state allocations.

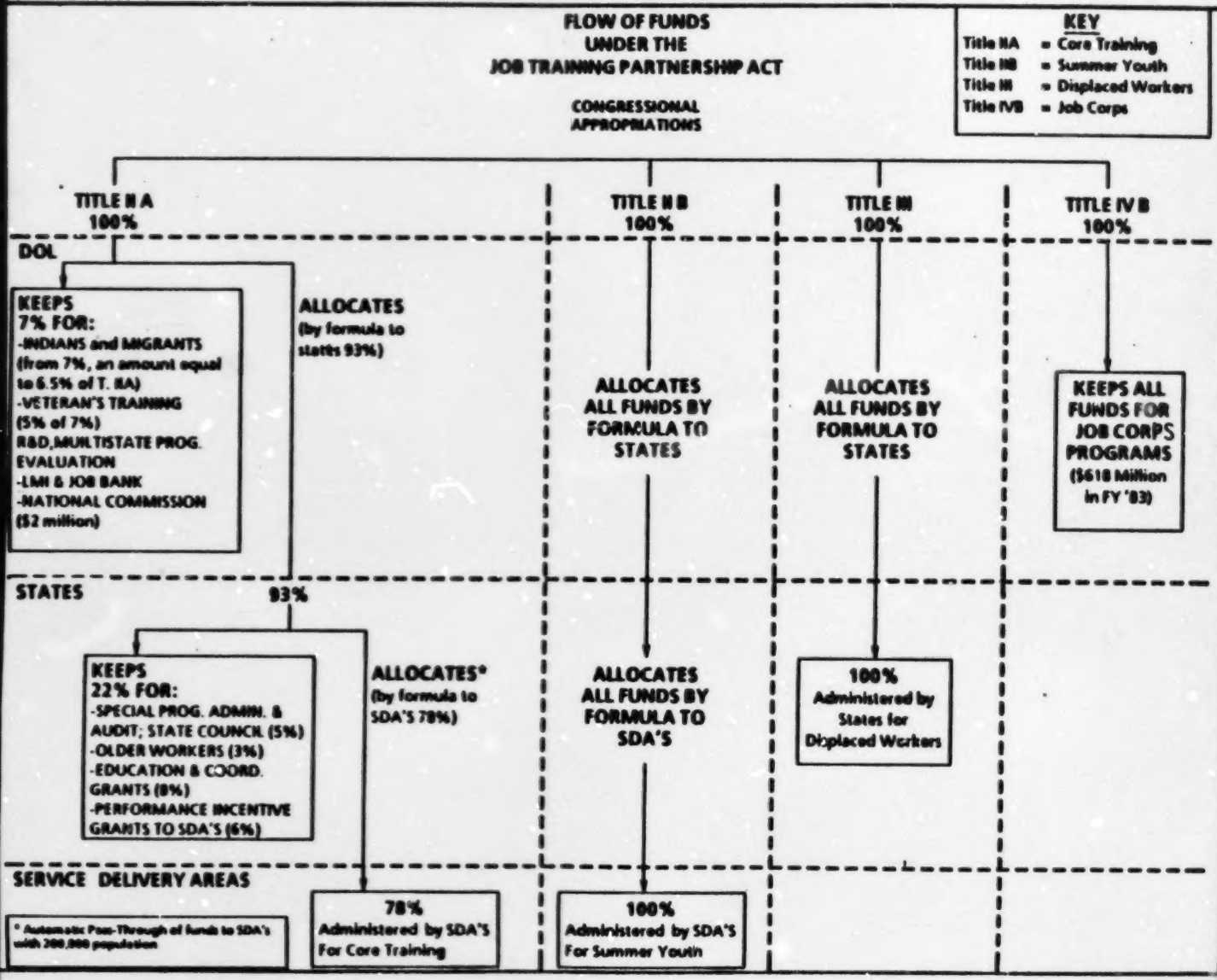
A. Funding Update

A stop-gap funding bill (continuing resolution) was signed into law by the President on October 1st. The continuing resolution provides emergency funding for hundreds of federal agencies and programs while Congress settles its differences over the regular appropriations bill for Fiscal Year 1984.

For the Job Training Partnership Act, the continuing resolution provides one-year funding of approximately $1.8 billion for basic JTPA programs, which is in line with President Reagan's budget request but considerably less than current funding levels.

Both the House and Senate have completed their respective versions of the Labor/Health and Human Services appropriations bill and conference on the measure is expected October 17th. The House's final recommendation for JTPA came to $6.559 billion; the Senate recommended $6.399 billion. On JTPA funding, these two versions differ in two respects. The House bill added $50 million for basic job training services. A similar amendment failed in the Senate. The Senate bill provides $73 million less for dislocated worker programs than does the House. Congress hopes to complete action on JTPA appropriations before the continuing resolution expires on November 10th.

SOURCE: National Alliance of Business



U.S. DEPARTMENT OF LABOR—EMPLOYMENT AND TRAINING ADMINISTRATION
OFFICE OF FINANCIAL CONTROL AND MANAGEMENT SYSTEMS
FY 1984 JTPA TITLE II-A ALLOTMENTS TO STATES

	ANNUAL ALLOTMENT	2 MONTH ALLOTMENT
ALABAMA	44,677,679	7,446,280
ALASKA	4,702,878	783,813
ARIZONA	21,875,801	3,645,967
ARKANSAS	20,476,758	3,412,793
CALIFORNIA	201,781,945	33,630,324
COLORADO	17,107,213	2,851,202
CONNECTICUT	18,878,260	3,146,377
DELAWARE	4,849,578	808,263
DIST OF COLUMBIA	6,563,998	1,094,000
FLORIDA	65,938,037	10,989,673
GEORGIA	38,161,683	6,360,281
HAWAII	5,815,738	969,290
IDAHO	7,820,290	1,303,382
ILLINOIS	99,623,611	16,603,935
INDIANA	51,197,132	8,532,855
IOWA	20,388,676	3,398,113
KANSAS	10,630,266	1,771,711
KENTUCKY	34,439,584	5,739,931
LOUISIANA	38,219,310	6,369,885
MAINE	8,305,709	1,384,285
MARYLAND	30,322,130	5,053,688
MASSACHUSETTS	39,025,904	6,504,317
MICHIGAN	109,086,686	18,181,114
MINNESOTA	24,999,709	4,166,618
MISSISSIPPI	24,778,892	4,129,815
MISSOURI	35,624,481	5,937,414
MONTANA	6,224,592	1,037,432
NEBRASKA	6,658,411	1,109,735
NEVADA	6,750,606	1,125,101
NEW HAMPSHIRE	5,121,964	853,661
NEW JERSEY	55,005,077	9,167,513
NEW MEXICO	10,998,226	1,833,038
NEW YORK	133,886,884	22,314,481
NORTH CAROLINA	45,135,235	7,522,539
NORTH DAKOTA	4,702,878	783,813
OHIO	103,385,356	17,230,893
OKLAHOMA	12,734,397	2,122,400
OREGON	25,429,021	4,238,170
PENNSYLVANIA	98,316,353	16,386,059
PUERTO RICO	66,144,892	11,024,149
RHODE ISLAND	7,462,976	1,243,829
SOUTH CAROLINA	29,269,366	4,878,228
SOUTH DAKOTA	4,702,878	783,813
TENNESSEE	43,610,153	7,268,359
TEXAS	82,839,260	13,806,543
UTAH	9,029,595	1,504,933
VERMONT	4,702,878	783,813
VIRGINIA	32,344,552	5,390,759
WASHINGTON	40,439,763	6,739,961
WEST VIRGINIA	18,268,737	3,044,790
WISCONSIN	37,992,124	6,332,021
WYOMING	4,702,878	783,813
AMERICAN SAMOA	388,917	64,820
GUAM	1,619,153	269,859
NORTHERN MARIANAS	125,000	20,833
TRUST TERRITORIES	887,120	147,853
VIRGIN ISLANDS	1,979,810	329,968
NATIONAL TOTAL	1,886,151,000	314,358,505

These are Title II-A allotments to states based on the level recommended in the recently-passed Continuing Resolution. Please note that these figures do not represent final allotments. The final allotments will be based on the latest unemployment data available and the final appropriation amount.

COMPARISON OF CETA WITH JTPA

ISSUE	CETA	JTPA
FUNDING	• $3.8 billion in FY '82	• Final appropriation undetermined • Continuing Resolution at current operating levels.
FUNDING RECIPIENT	• Local/State government	• State government, with sub-allocations to local SDAs.
DELIVERY AREA	• Individual Prime Sponsors (100,000 Population) • Consortium Prime Sponsors • Balance of State areas	• To be defined by Governor. • Single political jurisdictions and consortia of local governmental units with a minimum population of 200,000 qualify for automatic SDA designation and must be so designated by the Governor.
ROLE OF LOCAL ELECTED OFFICIAL	• Decision-making and policy. • Financial accountability • Appoint PIC and Administrative unit • Selection of Delivery Agents	• Appoint local PIC. • Negotiate agreement with PIC on —procedures for developing local plan; —selection of grant recipient • Approval of local job plan.
ROLE OF GOVERNOR	• Administer Balance of State • Operate State-wide programs • Coordinate Special Grants	• Receive and disburse State job training allotments; • Define Service Delivery Areas; • Establish State goals; • Establish performance Standards • Certify local PICs; • Approve local job training plans • Supervise, monitor and audit local programs.
ROLE OF PRIVATE INDUSTRY COUNCIL	• Advisory • Concurrent with Title VII plan	• Provide policy guidance and oversight of local programs; • Negotiate agreement with local elected official regarding: —procedures for developing local plan; —selection of grant recipient; identification of administrative entity. • Approval of local job plan.
ALLOWABLE ACTIVITIES	• Work Experience • OJT/Upgrading • Classroom Training • Skill Training • Public Service Employment • Job Search Training/Assistance • Career Education	• All activities under CETA except Public Service Employment, plus "tryout employment" for youth.
COMPENSATION PERMISSIBLE TRAINEES	• Wages • Allowances • Stipends • Supportive Services • Training Costs	• Considerable restrictions on income maintenance payments for wages, allowances, stipends. • 70% funds used for training; • 15% maximum funds for administration; • 15% maximum funds for supportive services to trainees.
ELIGIBILITY	• Various criteria depending upon which Title of CETA	• Economically disadvantaged is a person who meets any of the following: —receives or is a member of a family which receives cash welfare payments. —is/or is a member of a family that is at the poverty level or 70% of the lower living standard.

ISSUE	CETA	JTPA
		-receives or is a member of a family receiving food stamps -foster child. -handicapped adult. • Up to 10% of participants may be eligible regardless of income, if they have other barriers to employment such as drop-outs, limited English-speaking ability, offenders, displaced homemakers.
SERVICE PRIORITIES	• Youth were served under many CETA Titles. • Significant segments.	• Separate summer youth program under Title II. • Equitable services must be provided to AFDC recipients and school drop-outs based on their percentage of eligible population. • 40% of funds must be spent on youth 21 and under.
TARGETING OF LOCAL JOB TRAINING PLANS	• Provisions specified 37 different elements that had to be included in the plan, including targeting provisions which established a requirement for affirmative services to one group or another: significant segments, youth, low-income persons, veterans, persons with limited English-speaking ability, handicapped.	• Only 10 provisions that must be addressed by the plan and none of these call for targeted or affirmative/priority service
TARGETING OF SERVICES	• Prescribed services "to be made available" to "significant segments" of the population.	• Local programs "shall make efforts" to provide equitable services to "substantial segments" of the eligible population.
PERFORMANCE	• No similar provision. • Positive placements varies by Title.	• Developed by the Secretary of Labor: Adults • Placement in unsubsidized employment; • Retention of unsubsidized employment; • Increase in earnings; • Reductions in persons receiving cash welfare payments. Youth • Secretary will determine the appropriate mix of the above mentioned in addition to: • Attainment of employability competencies recognized by PIC; • School completion; • Enrollment in other programs or enlistment in military.

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IV. JTPA: IMPLICATIONS FOR HISPANICS

The highly decentralized nature of JTPA may lead to effective and innovative program approaches, but may also result in lack of enforcement of nondiscrimination requirements, minimal JTPA participation by community-based organizations (CBOs), and underrepresentation of Hispanics as program clients and successful placements. Major areas of concern are discussed below.

A. Lack of Enforcement of Nondiscrimination Requirements

1. Lack of Targeting Language

An effect of decentralization is the decrease in federal oversight to accomplish stated national goals. The 1978 amendments to CETA increased the federal role in targeting efforts. Whereas CETA prescribed services "to be made available" to "significant segments" of the population, JTPA merely suggests that local programs "shall make efforts" to provide equitable services to "substantial segments" of the eligible population. The differences in language illustrate a strong mandate for targeting in CETA versus a permissive approach to targeting in JTPA. Targeting language is key to assure access to employment and training programs by the disadvantaged and minorities.

The provisions regarding the job training plan further demonstrate the lack of targeting which accompanies JTPA. Under CETA, each prime sponsor was required to submit a plan to the Department of Labor detailing the services it planned and the manner in which those services would be delivered. Provisions of CETA specified 37 different elements that had to be included in the plan, including targeting provisions which established a requirement for affirmative services to one group or another; significant segments, low-income persons, veterans, youth, persons with limited English proficiency, offenders, etc. JTPA calls for a job training plan to be submitted to the Governor, not to the Department of Labor, and it specifies only ten provisions that must be addressed by the plan, none of which call for targeted or affirmative or priority services. Thus, under JTPA, the success of the job training plan, from an equal opportunity perspective, will depend on the commitment to this ideal by state and local officials.

B. Minimal JTPA Participation by Community-based Organizations

1. Definition of Community-based Organization

Community-based organizations (CBOs) play a dual role as advocates and

service providers for their constituencies. They are known to have a high success rate in reaching the disadvantaged. Within JTPA, Private Industry Council representatives from CBOs are to be chosen as part of a broad and extremely varied group that also includes representatives from organized labor, educational agencies, economic development agencies, and the public employment service. JTPA's statutory definition of a community-based organization is extremely broad; therefore, Hispanic CBOs which act as service deliverers may be excluded in favor of an organization which represents a more general constituency. Unlike specific provisions mandating private industry representation, JTPA does not contain language which mandates specific numbers for CBO representation. Exclusion of CBOs may result in policies which do not effectively address the means for reaching the disadvantaged.

2. 15% Limit on Administrative Costs

Many Hispanic and other community-based organizations may want to participate in JTPA but are effectively excluded because they do not have the non-JTPA resources to absorb the administrative responsibilities required by JTPA, such as management information systems and fiscal accounting, and do not have the capacity to provide such systems while staying within JTPA's 15% cap on administrative costs. Larger established organizations like the Employment Service, school systems, and training institutes which do have sizable administrative staffs funded by other resources can absorb some of the administrative costs of a JTPA program. Therefore, JTPA limits on administrative costs may preclude some of the most effective recruiters and service providers such as CBOs from participating in the Job Training Partnership Act. If CBOs are effectively excluded from JTPA, then there will be a lack of organizations which effectively reach the disadvantaged, such as the Hispanic community, thus causing Hispanic participation rates to plummet.

C. Underrepresentation of Hispanics

1. Lack of Training Stipends

Under JTPA, the lack of training stipends affects the access to training programs by the truly disadvantaged, including many Hispanics. Due to family income needs, there may be a strong tendency for individuals to take any job which becomes available, rather than completing training. This is a particular problem for the Hispanic community, which has a high poverty rate and also a high rate of underemployment. If the disadvantaged want to take advantage of a training program, they may have to incur additional expenses such as transpor-

tation and child care costs, and suspend personal job search efforts. The lack of training stipends may effectively exclude Hispanics and other minorities from participating in a training program. The law allows needs-based payments necessary for participation; however, they are to be determined under a locally developed formula or procedure, which will mean a lack of uniform standards, thus resulting in 50 different needs-based payment formulas.

2. Performance Standards

In the past, the federal government prescribed at great length and detail how training programs were to be conducted, emphasizing the means rather than the end. JTPA's emphasis on results is a major legislative shift in social policy. Performance standards, more than any other part of JTPA, are critical to the outcomes-based system. Their importance is emphasized by the fact that 6% of the funds allocated to the states can be used to reward high performers, and that sanctions must be applied to consistently poor performers. JTPA mandates that the basic measure of performance for adult training programs under Title II is the increase in employment and earnings and the reductions in welfare dependency resulting from participation in the program. JTPA mandates the Secretary of Labor to prescribe performance standards on the basis of appropriate factors which may include (A) placement in unsubsidized employment, (B) retention in unsubsidized employment, (C) the increase in earnings, including hourly wages, and (D) reduction in the number of individuals and families receiving cash welfare payments. While the benefits of such accountability are obvious, the inherent danger of performance standards based on positive placement is that it may encourage "creaming"--the tendency to select as clients persons who are least disadvantaged and easiest to place. Unfortunately, Hispanics and other minorities with serious employment barriers do not usually fall into this category.

Community-based organizations (CBOs) are affected the most by performance standards emphasizing placement. It makes little sense to have performance standards which develop unit costs per placement without considering the nature of the client and any special problems such a client may have. Clearly, the more disadvantaged the client, the more likely that effective program services will cost more and run longer. Consequently, CBOs, as well as other entities, may be encouraged to "cream" by serving client who are least disadvantaged, have least need for employability development, and are easiest to place, in order to meet the performance criteria and get refunded. The practice of "creaming" would neglect the intended and most important beneficiaries of JTPA, the disadvantaged

and structurally unemployed. The mechanism for ensuring that services are delivered to those most in need is targeting, a mechanism which is all but nonexistent in the Job Training Partnership Act.

V . MONITORING QUESTIONS

The following monitoring questions are designed to ascertain the degree of Hispanic participation in the Job Training Partnership Act. They are divided into two categories--state level and local level. This division not only indicates different questions for different levels, but it also points out the areas where influence or pressure may be exerted. For example, at the state level, the Governor and members of the State legislature and State Job Training Coordinating Council are susceptible to pressure by special-interest groups. At the local level, the local elected official and the members of the Private Industry Council are vulnerable to such pressure.

A. State Level

1) What are the Governor's state goals and objectives for job training programs? How will the needs of Hispanics, AFDC recipients, school drop-outs be met?

2) Have any State regulations/guidelines been issued by the State legislature regarding JTPA? What do they say?

3) What is the composition of the State Job Training Coordinating Council? Are Hispanics represented? Are community-based organizations represented?

4) Does the Governor, in his/her state goals and objectives, provide for any special targeting/affirmative or priority services for Hispanics and other minorities?

5) JTPA mandates that up to 10% of individuals may participate in the program even if they are not economically disadvantaged as long as they face other "barriers to employment." How does the Governor define "barriers to employment?" Does the definition include persons with limited English proficiency, displaced homemakers, offenders, school drop-outs, veterans?

6) How does the state determine allocations of funds among SDAs? What factors are used? Are unemployment, number of AFDC recipients, number of school drop-outs, poverty level rate factors in such formulas?

B. Local Level

1) What is the composition of the Private Industry Council (PIC)? Are Hispanics represented? Are community-based organizations represented? Are small/minority business represented?

2) What are the provisions of the job training plan? Are Hispanics, AFDC recipients, school drop-outs specifically identified to receive targeted services?

3) What are the local procedures for selecting service providers? Does this procedure emphasize subcontracting to community-based organizations? Does this procedure place emphasis on Hispanic community-based organizations?

4) Have Hispanic community-based organizations been defunded? On what basis?

5) Does the local job training plan include exemplary youth programs such as preemployment skills training, school-to-work transition?

6) Which youth employment competencies have been recognized by the PIC as a measure of positive termination for youth participants?

7) Was the job training plan available for public review? What were the means utilized to publicize review of the plan?

8) What is the locally-developed formula/procedure for making needs-based payments to JTPA participants?

9) JTPA stipulates that the 30% limit on administrative costs and supportive services may be waived if excess costs are due to an unemployment rate which exceeds the national average by three percentage points, or the job training plan for such area proposes to serve a disproportionately high number of participants from groups requiring exceptional supportive service costs. This waiver, however, must be requested by the PIC. Has the PIC requested a waiver on the 30% cap on administrative costs and services in order to accomodate more supportive services for those most in need of training but least likely to afford it? Has the Governor approved the waiver?